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6 Attorneys for Defendant

7  
8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 CHARLES RAY BELL, JR.,

14 Defendant.  
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2:14-cr-138-JAD-VCF

**UNOPPOSED MOTION TO CONDUCT**  
**A PRE-PLEA PRESENTENCING**  
**INVESTIGATION REPORT AND**  
**ORDER**

16 COMES NOW, appointed counsel, Raquel Lazo, Assistant Federal Public Defender, hereby  
17 moves this Court request a Pre-Plea Pre-Sentence Investigation Report be prepared by the  
18 Probation department.

19 1. It appears that defendant may be Armed Career Criminal eligible under 18 U.S.C.  
20 section 924(e). Whether the defendant is subject to this enhancement will drastically impact his  
21 sentencing exposure, negotiations, and client's decision as to how he should proceed. A pre-plea  
22 presentence report will promote judicial economy and aid in the manner in which this case is  
23 ultimately resolved.

24 2. Undersigned counsel therefore respectfully requests an order that the Department of  
25 Probation conduct a pre-plea presentence investigation report as soon as possible.

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1           3.       Undersigned counsel has spoken to the prosecutor, Assistant United States Attorney  
2 Phillip N. Smith, Jr. regarding this request and he has no opposition.

3           DATED this 23<sup>rd</sup> day of June, 2014.

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5                           RENE L. VALLADARES  
6                           Federal Public Defender

7                           /s/ *Raquel Lazo*

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9                           RAQUEL LAZO,  
10                          Assistant Federal Public Defender  
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**ORDER**

15  
16 IT IS HEREBY ORDERED that the Probation Department will prepare a Pre-Plea  
17 Pre-Sentence Investigation Report on Defendant Charles Ray Bell, Jr.

18 Dated: June 23, 2014.

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22 UNITED STATES DISTRICT JUDGE  
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